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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054

AUG - 6 2004

Federal Communications Commission  
Office of Secretary

In the Matter of:

Amendment of Section 73.622(b),  
Table of Allotments,  
Digital Television Broadcast Stations.  
(Santa Ana, California)

MB Docket No. 04-225  
RM-10695

TO: Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**COMMENTS IN SUPPORT**

Trinity Christian Center of Santa Ana, Inc., d/b/a/ Trinity Broadcasting Network, licensee of KTBN-TV, Santa Ana, California ("Trinity" or "KTBN"), hereby submits its comments supporting the captioned rulemaking to substitute DTV channel 33 for KTBN's assigned DTV channel 23c.

**Trinity's Proposal Complies With the Commission's Rules  
and Will Greatly Expand Service**

Attached is an Engineering Statement verifying that, as originally explained in its May 20, 2004 petition (hereby incorporated herein), Trinity's proposal will allow KTBN to serve a substantially greater audience on DTV channel 33 than would be the case with DTV channel 23. Based on the 2000 Census data, the service population of the channel 33 proposal is 15,035,227, while the presently allocated channel 23 service population is only 13,429,034. In addition, Trinity's proposed channel 33 allotment meets the Commission's city-grade service requirements. The community of license, Santa Ana, is completely contained within the proposed 48 dBu contour, as required in Section 73.625(a) of the Commission's Rules. Moreover, the proposed channel 33 allotment meets the Commission's *de minimis* interference criteria specified in Section 73.623(c)(2)

of the Rules to all pertinent full-power DTV and NTSC stations, and Class A low power television facilities.

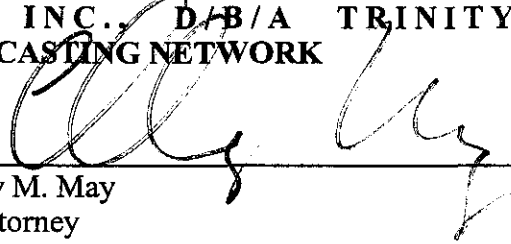
**Upon Grant of its Proposal Trinity Will  
Promptly Apply for and Construct on DTV Channel 33**

Trinity hereby confirms that if the Commission grants its proposal, it is Trinity's present intention is to apply for channel 33, and upon grant thereof, to construct the facility and initiate broadcast operations promptly thereon.

**WHEREFORE**, based on the foregoing, and the material in its original May 20, 2004 petition, Trinity respectfully requests the Commission to change the DTV allocation for Santa Ana, California from channel 23c to channel 33.

Respectfully submitted,

**TRINITY CHRISTIAN CENTER OF SANTA  
ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK**

By:   
Colby M. May  
Its Attorney

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August 6, 2004

EXHIBIT A

ENGINEERING STATEMENT

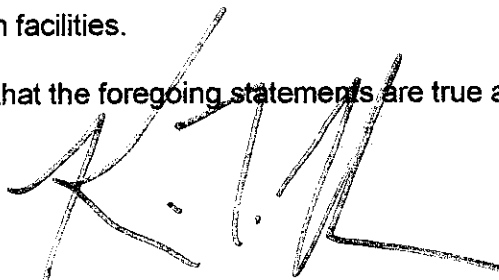
The engineering data contained herein have been prepared on behalf of TRINITY BROADCASTING NETWORK, licensee of KTBN-TV in Santa Ana, California, in support of its comments regarding the Commission's Notice of Proposed Rulemaking to substitute Channel 33 for Channel 23 as the digital television allotment for KTBN-DT.

The allotment of Channel 33 to KTBN-DT as proposed in BPRM-20030204AHA will allow the station to serve a substantially greater audience than would obtain from that of the authorized KTBN-DT facility on Channel 23. Based upon the 2000 Census data, the service population of the Channel 33 proposal is 15,035,227, whereas the authorized Channel 23 service population is 13,429,034.

In addition, the proposed Channel 33 allotment meets the FCC's city-grade service requirements. The community of license, Santa Ana, is completely contained within the proposed 48 dBu contour, as required in Section 73.625(a) of the Commission's Rules.

Finally, the proposed Channel 33 allotment meets the FCC's de minimis interference criteria in Section 73.623(c)(2) of the Rules to all pertinent full-power DTV and NTSC stations as well as to Class A Low Power Television facilities.

I declare, under penalty of perjury, that the foregoing statements are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', is written over the signature line.

KEVIN T. FISHER

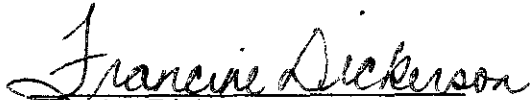
August 4, 2004

CERTIFICATE OF SERVICE

I, Francine Dickerson, a secretary in the Law Offices of Colby M. May, Esq., P.C., hereby certify that I have caused to be sent, this 6<sup>th</sup> of August 2004, via hand delivery, a true and correct copy of the foregoing COMMENTS IN SUPPORT to the following:

W. Kenneth Ferree, Chief  
Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Barbara A. Kreisman, Chief  
Video Division  
Media Bureau  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

  
Francine Dickerson